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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS AND THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
EXTENDING TIME TO RESPOND TO
THE MOTION OF THE AD HOC
COMMITTEE OF SENIOR UNSECURED
NOTEHOLDERS TO TERMINATE THE
DEBTORS' EXCLUSIVE PERIODS
PURSUANT TO SECTION 1121(d)(1) OF
THE BANKRUPTCY CODE [Dkt. No.
2741]**

Date: July 24, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by, on the one hand, the Ad Hoc Committee of Senior Unsecured Noteholders of
3 Pacific Gas and Electric Company (the “**Ad Hoc Committee**”) and, on the other hand, the Official
4 Committee of Tort Claimants (“**TCC**”) in the chapter 11 cases of PG&E Corporation and Pacific
5 Gas and Electric Company (the “**Debtors**” or “**PG&E**”). The Ad Hoc Committee and the TCC are
6 referred to in this Stipulation and Agreement for Order collectively as the “Parties.” The Parties
7 hereby stipulate and agree as follows:

8 **RECITALS**

9 On June 25, 2019, the Ad Hoc Committee filed the Motion of the Ad Hoc Committee of
10 Senior Unsecured Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to Section
11 1121(d)(1) of title 11 of the Bankruptcy Code [Dkt. No. 2741] (“**Motion**”). The Motion is set for
12 a hearing before the Court at 9:30 a.m. on July 24, 2019, and the objection deadline is 4:00 p.m. on
13 July 17, 2019.

14 Counsel for the Ad Hoc Committee and the TCC have agreed that the time for the TCC to
15 respond to the Motion should be extended.

16 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
17 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
18 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
19 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
20 **THAT:**

21 1. The time for the TCC to file and serve any response or opposition to the Motion to
22 Terminate Exclusivity is extended through 4:00 p.m. (Pacific Time) on July 18, 2019.

23 Dated: July 15, 2019

Dated: July 15, 2019

24 AKIN GUMP STRAUSS HAUSER &
FELD LLP

BAKER & HOSTETLER LLP

25 By: /s/ Ashley Vinson Crawford
Ashley Vinson Crawford

By: /s/ Cecily A. Dumas
Cecily A. Dumas

27 *Counsel for the Ad Hoc Committee of*
Senior Unsecured Noteholders

Counsel for Official Committee of Tort
Claimants